

Herbicide Incident Survey Question Ideas for 2022 – draft 6-1-2022

This document reflects the conversation at the AAPCO Board-EPA meeting regarding AAPCO's survey for the upcoming 2022 use season.

Quantitative Survey Question Ideas:

1. Herbicide incidents (regardless of active ingredient) in state for the 2022 growing season:
 - a. Total number of herbicide incidents by state and by county.
2. Dicamba incidents for the 2022 growing season
 - a. Total number of dicamba incidents by state and by county.
 - b. Number of those incidents that were in counties where there are Endangered Species Act pesticide use limitations on dicamba pesticide product labels that allow applications to dicamba-tolerant soybeans and cotton.
3. To ensure that EPA has the most up-to-date numbers, please provide numbers for questions 1 and 2 for previous years 2020 to present.
4. Based on your experience in 2022, describe dicamba incidents in your state ranking them in terms of the most common reason for the occurrence of those incidents: label misuse, volatility, spray drift, applicator error, runoff, equipment contamination, other, unknown.
5. List the crops and vegetation that were impacted in dicamba incidents. Please include whether certain incidents were identified on protected land (such as state parks, wildlife preserves, national forest, etc.)
6. Acreage of vegetation reported to have been part of dicamba incidents. If exact numbers are not available, please provide an estimate.
 - a. Acreage per specific incident
 - b. Total acreage in your state
7. What percent of the time would you say that dicamba damage referenced in incidents fit into the following categories:
 - a. Uniform (no gradient)
 - b. Gradient (clear difference in damage from higher to lower severity that follows a pattern within the impacted area)
 - c. Patches (e.g., outer portion of incident site undamaged but interior pockets of damage)
8. Acres of DT crops planted in your state (soybean and cotton) in 2022.
9. Resistance:
 - a. Have you received any reports of weed resistance to dicamba in your state?
 - b. If so, please provide details on the weed species noted and the extent of the occurrence of resistance, and in what year(s) you received those reports.
10. Have growers had to adjust their planting dates or growing practices for 2022 due to meteorological conditions such as significant rain events (i.e., had to plant later in the season due to flooding)? Are there any unusual factors that are impacting this year's planting date or production season?
11. If available, estimate of the resources (in terms of staff hours) your state has spent on matters relating to dicamba over-the-top applications? Please describe to date as well as predicted total year expenditures for 2020, 2021, and 2022. In your estimate, please consider resources spent on training, complaints, investigations, spot-checks, etc. related to dicamba over-the-top applications.

Commented [HM1]: Group discusses timing of release of survey. Milestones to keep in mind include fall purchases, January/Feb training events, and EPA's reg. review schedule.

Commented [HM2R1]: August or September are ...

Commented [HM3]: AAPCO – will ask for this but notes ...

Commented [HM4]: AAPCO can ask but by county data ...

Commented [HM5R4]: EPA notes an N/A response ...

Commented [HM6]: See previous comment.

Commented [HM7]: Meg has emailed a table to Amy S ...

Commented [HM8]: Have this question only in the stat ...

Commented [HM9]: Recast as "based on your ...

Commented [HM10R9]: Possibly for both the current ...

Commented [HM11R9]: Counterpoint – SLAs will still b ...

Commented [HM12R9]: AAPCO will work separately o ...

Commented [HM13]: WSSA notes that multiple reason ...

Commented [HM14]: This question is tailored to asking ...

Commented [HM15R14]: Amy suggests that if EPA ...

Commented [HM16R14]: Group adds that before the ...

Commented [HM17]: Add number of incidents that ...

Commented [HM18]: SLA question.

Commented [HM19R18]: Not all states can easily ...

Commented [HM20R18]:

Commented [HM21]: Group opinion varies on this ...

Commented [HM22]: Limit this question to non-soybe ...

Commented [HM23]: A question for both WSSA and ...

Commented [HM24R23]: Pat notes answering this ...

Commented [HM25R23]: This question is a candidate ...

Commented [HM26R23]: Kevin B. says can count on o ...

Commented [HM27]: May add new question asking ...

Commented [HM28R27]: Is EPA also asking about ...

Commented [HM29R27]: Group clarifies that they ...

Commented [HM30]: Extension only question, suggest ...

Commented [HM31R30]: EPA adds could add "estimat ...

Commented [HM32]: Extension only question, the gro ...

Commented [HM33]: Ask for not just this year but 3 ...

Commented [HM34]: WSSA/Extension question.

Commented [HM35]: Group agrees to keep this an SLA ...

12. 2,4-D Herbicide Question:

- a. Total number of 2,4-D incidents in your state for the 2022 growing season

Commented [HM36]: WSSA and SLA could both address this question.
WSSA suggests parsing out OTT 2,4-D use specifically.

Open Response Question Ideas:

13. What qualifies as an “incident” in your state? In other words, how does a state define incidents that would be counted in your state’s records? What about calls/communications where the person contacting the state does not want officials to conduct a follow-up investigation?
14. Has your state implemented additional restrictions beyond the federal label? If so, what has been your experience with this?
15. What mitigation ideas does your state have that EPA has not yet implemented?

Commented [HM37]: 13 and 14 are state lead agency-focused questions. Won’t be part of the WSSA/extension survey portion.

Commented [HM38R37]: 15 will be a question for everyone, the group agrees.